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Attorneys for Defendant
Joseph Paul Herrera Kinney

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23-cr-318-TLN
)
Plaintiff,) **STIPULATION AND ORDER TO MODIFY**
) **CONDITIONS OF RELEASE**
)
vs.) Judge: Hon. Carolyn K. Delaney
)
JOSEPH PAUL HERRERA)
KINNEY,)
)
Defendant.)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Justin Lee, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joseph Paul Herrera Kinney, that the amended special conditions of bond be modified as follows.

The parties specifically stipulate as follows:

1. Mr. Kinney is on pretrial release and his amended special conditions restrict him to home detention. ECF no. 30 at ¶ 16.
2. On June 15, 2024, from 1:00 p.m. to 9:00 p.m., Mr. Kinney's family will have a barbecue to celebrate his mother's and grandfather's birthdays. The celebration will occur at Mr. Kinney's grandmother's home located at 316 Arlington Court, Suisun City, California.

1 3. Mr. Kinney moves for special condition #16 to be amended to allow him to attend
2 the barbecue. He specifically requests that home detention be lifted from 12:30
3 p.m. to 9:30 p.m. on June 15, 2024, and that he be allowed to travel to and from
4 316 Arlington Court, Suisun City, California during that time.
5 4. All other conditions will remain in place.
6 5. The government and pretrial services do not object to Mr. Kinney's motion.

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Respectfully submitted,

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HEATHER E. WILLIAMS
Federal Defender

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Date: June 11, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Joseph Paul Herrera Kinney

Date: June 11, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 11, 2024

CAROLYN K. DELANEY
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE